

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Two)

Docket No. RM2018-5

PUBLIC REPRESENTATIVE SECOND MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(July 6, 2018)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning the proposed changes to analytical methods related to the sampling procedure for the city carrier portion of the In-Office Cost System (IOCS), labeled as Proposal Two.¹ The proposed question seeks information that will allow participants to provide more constructive comments and evaluate whether the proposal meets the applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed, reasoned determination on whether Proposal Two meets applicable legal and regulatory requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

Proposed Question

1. The Postal Service states that “[t]he maximum number of city carrier routes in a zone is 74.”² The Postal Service also states that “[b]efore the test begins, the

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Two), May 25, 2018 (Petition).

² Responses of the United States Postal service to Questions 1-9 of Chairman’s Information Request No. 1, question 10, June 29, 2018.

data collector identifies all carriers who will be working and assigned to the tested zone for any part of the morning.” Petition, Proposal Two at 20.

- a. Please indicate the maximum number of carriers working in a zone in any part of the morning (up to 11 a.m.).
- b. Please confirm that the number of carriers working in a zone in the morning is proportional (or nearly proportional) to the number of routes in a zone. If not confirmed, please explain.

Respectfully submitted,

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